



SOWELL GRAY STEPP & LAFFITTE, LLC
ATTORNEYS AND COUNSELORS AT LAW

December 3, 2003

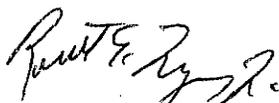
The Honorable Bruce Duke
Acting Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Intervention in Docket No. 1997-239-C
SGS&L File No. 5665/1501

Dear Mr. Duke:

Enclosed please find the original and 11 copies of ITC^DeltaCom's Petition to Intervene in the above-referenced Docket. We would appreciate your filing as appropriate and returning a file-stamped copy to us in the self-addressed, stamped envelope also enclosed. ITC^DeltaCom believes it currently is a party of record in this matter; however, out of an abundance of caution, ITC^DeltaCom refiles this Petition to Intervene. By copy of this correspondence I am serving same on the known parties of record.

Sincerely,



Robert E. Tyson, Jr.

Robert E. Tyson, Jr.
rtyson@sowell.com

/alh

Enclosures

cc: See Certificate of Service

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**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

Docket No. 1997-239-C

In Re:)	ITC^DELTA COM
)	COMMUNICATIONS, INC.'S
Applications of Bellsouth)	PETITION TO INTERVENE IN
Telecommunications, Inc., et al.)	DOCKET NO. 1997-239-C
for Intrastate Universal Service Funding)	
)	

Pursuant to Rule 103-836 of the Regulations of the Public Service Commission of South Carolina ("Commission"), ITC^DeltaCom Communications, Inc. ("ITC^DeltaCom") submits its petition to intervene in the above-captioned Docket Number 1997-239-C. In support hereof, ITC^DeltaCom shows as follows:

1. ITC^DeltaCom is a telecommunications company duly organized and existing under the laws of the State of Alabama. ITC^DeltaCom, a competitive local exchange carrier and an interexchange carrier operating in South Carolina, provides telecommunications services to customers throughout the State of South Carolina.

2. The legal name and address of ITC^DeltaCom are as follows:

ITC^DeltaCom Communications, Inc.
4092 South Memorial Parkway
Huntsville, Alabama, 35802

3. The full name and address of the authorized representative of ITC^DeltaCom are as follows:

Robert E. Tyson, Jr., Esquire
Sowell Gray Stepp & Laffitte, LLC
1310 Gadsden Street
Columbia, South Carolina 29201

4. In Commission Order No. 2001-419 issued under Docket No. 1997-239-C,

the Commission allowed eligible local exchange carriers to remove implicit support from its rates. BellSouth filed tariff revisions to reduce certain of its switched access service rates to remove a portion of the implicit support in those rates. To offset the lost revenues associated with the proposed rate reductions, BellSouth is seeking additional intrastate universal service funding.

5. ITC^DeltaCom has an interest in the instant proceeding because the application for increased intrastate universal service funding will have an impact on ITC^DeltaCom who is a contributor to the fund.

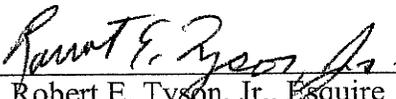
6. As a provider of telecommunications services, ITC^DeltaCom's interests are not adequately represented by any other party to this proceeding. Accordingly, ITC^DeltaCom requests that it be permitted to intervene in this proceeding in order to protect its interest.

7. The position of ITC^DeltaCom in this proceeding is to assist the Commission in its fact finding role to determine the adequate funding level for the universal service fund.

8. ITC^DeltaCom is informed and believes that granting its request to be made a party of record in this proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in issues before it, and should be allowed so that a full and complete record addressing the views and concerns of ITC^DeltaCom can be developed.

WHEREFORE, for the foregoing reasons, ITC^DeltaCom respectfully submits its intervention in the above-captioned Docket Number 1997-239-C and requests that it be permitted to participate therein with full rights as a party.

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

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Attorneys for ITC^DeltaCom Communications, Inc.

Columbia, South Carolina

December 3, 2003

CERTIFICATE OF SERVICE

I, the undersigned paralegal of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for ITC^DeltaCom Communications, Inc., do hereby certify that I have served a copy of the pleading(s) hereinbelow specified via United States Mail, postage prepaid, to the following address(es):

Pleadings: ITC^DELTACOM COMMUNICATIONS INC.'S PETITION
TO INTERVENE IN DOCKET NO. 1997-239-C

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